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## UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE:

Lance E. Stone

Chapter 13

Javette L. Stone

:

Debtors

Case No.: 18-14682-JKF

## MOTION TO RECONSIDER DISMISSAL

Comes Now, Lance and Javette Stone, hereinafter referred to as "Debtors" and move this Honorable Court to vacate its December 4, 2019 Order Dismissing the instant matter and in support thereof aver the following:

- 1. The above captioned bankruptcy matter was filed as a Chapter 13 on or about July 16, 2018.
  - 2. The Chapter 13 bankruptcy matter was assigned case number 18-14682.
- The Chapter 13 Plan was confirmed by this Honorable Court on April 24,
  2019.
- 4. On or about July 15, 2019 the Chapter 13 Trustee filed a Motion to Dismiss the instant matter for failure to make timely and regular Chapter 13 payments.
- 5. In furtherance of the Trustee's Motion the instant matter was dismissed on December 4, 2019.
- 6. Due to a miscommunication, Debtors case was dismissed prior to filing a Motion to Convert the case to Chapter 7.
  - 7. The Debtors are desirous of converting their case to Chapter 7.

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WHEREFORE, for the reasons stated herein, the Debtors respectfully request that this Honorable Court Reconsider its December 4, 2019 Order dismissing the instant matter.

Respectfully submitted,

Dated: December 10, 2019

/s/ Brad J. Sadek, Esquire Brad J. Sadek, Esquire Sadek and Cooper 1315 Walnut Street Suite 502 Philadelphia, PA 19107